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STATE OF FLORIDA



DIVISION OF ECONOMICS  
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# Public Service Commission

June 3, 2024

Beth Keating, Esquire  
Gunster, Yoakley & Stewart, P.A.  
215 South Monroe Street, Suite 601  
Tallahassee, FL 32301  
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## **STAFF'S FOURTH DATA REQUEST VIA E-MAIL**

Matt Everngam  
Director, Regulatory Affairs  
208 Wildlight Avenue  
Yulee, FL 32097  
[Meverngam@chpk.com](mailto:Meverngam@chpk.com)

**Re: Docket No. 20240039-GU: Petition for approval of transportation service agreements between Peninsula Pipeline Company, Inc. and Pivotal Utility Holdings, Inc. d/b/a Florida City Gas.**

Dear Ms. Keating and Mr. Everngam:

By this letter, Commission staff respectfully requests that Peninsula Pipeline Company, Inc. (Peninsula) and Florida City Gas (FCG) provide responses to the following questions:

1. Please provide a copy of the agreements between each RNG producer and FCG. If any of these agreements are not yet final or approved, provide an estimated date for when you anticipate them to be finalized.
  - a. Identify and describe the portion(s) of the agreements between each RNG producer and FCG that may impact the transportation service agreements (TSA) between FCG and PPC. These should include, if applicable, any cost-sharing arrangements regarding gas transportation expenses, in-service dates, terms regarding treatment of a reduction, delay, or cessation of production gas flows, etc.
  - b. Provide an estimate of the annual amount of payments to and from the RNG producer under the contract for each year of the contract term, and a net present value of the total payments. As part of this estimate, provide a breakdown of the

- components of each of the payments (such as for gas, RNG credit sharing, maintenance, or other revenues/expenses).
- c. Provide an estimate of the annual purchased gas cost under the contract for each year of the contract term.
  - d. Provide a comparison of the cost of gas purchased under the contract with the cost of gas from traditional out of state sources for each year of the contract term.
2. Please provide the annual amount of current and projected capacity reserved by FCG from other source(s), such as interstate pipelines, for each of the counties for which a TSA is being sought and FCG's annual amount of current and projected customer demand for each of those counties for the years 2020 through 2034.
- a. Identify and provide the reliability requirements must FCG meet above the customer demand, along with the source of that requirement (such as a federal, state, or local code, rule, or statute).
  - b. Identify and describe any long-term supply options FCG is evaluating to address projected customer demand. As part of this description, state when each of the supply option(s) is projected or scheduled to be implemented.
  - c. Please discuss FCG's plans, if any, to purchase additional capacity to meet demands in each of the three areas impacted by the proposed TSAs. As part of that discussion, state when FCG anticipates making the capacity purchases.
3. Please refer to the Company's response to staff's third data request, No. 2.
- a. Does Peninsula and/or FCG agree that a Commission decision to approve the TSAs in the instant docket does not bind the Commission in establishing cost recovery through the Purchased Gas Adjustment (PGA) Clause and/or base rates, except that the rate established by the TSAs are just and reasonable pursuant to Section 368.105(3), Florida Statutes? If not, explain.
  - b. The responses states that "the Commission will have an opportunity to review the associated capacity costs FCG will incur in the annual review of the PGA factor." Please clarify what is meant by "associated capacity costs."
  - c. Please explain and discuss the "other associated costs" that could be an issue in the next rate case.

Keating & Everngam

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4. Referring to the responses to Staff's Third Data request, Nos. 15 and 17, please explain how the portion of the costs for each project (Brevard County and Miami Dade) allocated to FCG was determined. Provide any supporting documentation to show how the allocation percentages were determined.
5. Referring to the responses to Staff's Third Data request, No. 16, please explain why the whole Indian River County Project is paid for FCG (and there is no splitting of the costs between utility and the producer).

Please file all responses electronically no later than June 10, 2024 through the Commission's website at [www.floridapsc.com](http://www.floridapsc.com), by selecting the Clerk's Office tab and Electronic Filing Web Form. In addition, please email the filed response to [discovery-gcl@psc.state.fl.us](mailto:discovery-gcl@psc.state.fl.us) and add this email address on the service list block associated with the PSC attorney assigned to this docket. Please contact me at [sguffey@psc.state.fl.us](mailto:sguffey@psc.state.fl.us) or at 850.413.6204 if you have any questions.

Thank you.

*/s/Sevini Guffey*

Sevini Guffey

Public Utility Analyst IV

cc: Office of Commission Clerk